

1 June 2018

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**RE: Western Sydney Long Term Strategic Transport Corridors**

The Australian Logistics Council (**ALC**) is pleased to make this submission on the Western Sydney Corridors Program.

ALC is the peak national body representing the major and national companies participating in the freight logistics industry with a focus on national supply chain efficiency and safety.

The efficient delivery of freight relies on adequate transport infrastructure.

In 2016, the National Transport Commission (**NTC**) estimated that Australia's freight task had increased by 50% in the 10 years to 2016 and was estimated to grow by 26% over the decade to 2026.<sup>1</sup>

Furthermore, according to the [TomTom Traffic Index](#), Sydney is ranked as Australia's most congested city and 29<sup>th</sup> most congested city in the world. In 2016, TomTom estimated that congestion in Sydney increased travel times by 39%, up by 3% on 2015.<sup>2</sup>

Taking these figures into account, Sydney is facing a situation whereby the freight task, as well as congestion, will be increasing. This has the potential to increase inefficiencies in freight delivery, leading to longer delivery times for businesses and online consumers.

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<sup>1</sup> National Transport Commission, *Who Moves What Where* (2016): 15.

<sup>2</sup> See [https://www.tomtom.com/en\\_gb/trafficindex/city/sydney](https://www.tomtom.com/en_gb/trafficindex/city/sydney)

### List of Recommendations

1. Statutory planning controls should be used to protect corridors identified as a future transport corridor.
2. Any NSW Government planning instrument should follow the principles listed in **Attachment A – ALC Planning Principles**.
3. The NSW Government should develop an Environmental Planning Policy as soon as practicable to ensure that the relevant corridors identified in the four draft strategic environmental assessments are protected.
4. If necessary, changes should be made to the *Environmental Planning and Environment Act 1979* to remove any possible capacity for lower level planning instruments to be able to permit land uses prejudicing the efficient use of the transport corridors.
5. The NSW Government and industry must work collectively and collaboratively to promote the benefits of corridor protection to NSW residents.
6. With the corridors identified, the NSW Government should identify the timeframes for future construction of projects such as the Western Sydney Freight Line.

## Corridor Protection

Identifying future transport corridors, and protecting them from residential and commercial encroachment, is an effective way to help cities deal with increasing freight traffic without increasing congestion.

ALC has been a long-time advocate for the development of corridor protection strategies.

Our recent [submission on the Draft NSW Freight and Ports Strategy](#), said:

*“ALC applauds the decision from the NSW Government, made on 26 March 2018, to protect four major road and rail corridors in Western Sydney...”*

*The benefits of corridor protection are numerous and include budget savings (as the government doesn’t need to acquire land or relocate telecommunications infrastructure), certainty for the freight logistics industry, which allows industry to more readily invest, as well as certainty for residents.*

*To emphasise the potential budget savings, Infrastructure Australia noted in its 2017 report, [Corridor Protection: Planning and investing for the long term](#), that close to \$11 billion (in 2016 dollars) could be saved on land purchases and construction costs on seven corridors identified as national priorities on the Infrastructure Priority List.<sup>3</sup>*

*This included NSW related projects such as the Lower Hunter rail freight alignment (with a potential saving of \$33 million), the Outer Sydney Orbital road and rail link (\$3,665 million), the Western Sydney Airport rail connection (\$1,104 million) and the Western Sydney freight line and intermodal terminal access (\$1,605 million).*

*While there is likely to be Australian Government funding involved in all these projects, the savings for the NSW Government should not be understated.<sup>4</sup>*

In particular, it is pleasing to see the NSW Government working collaboratively with Infrastructure Australia by seeking to protect corridors for the Western Sydney Freight Line and the Outer Sydney Orbital. See **Attachment B – Map of Western Sydney Corridors**

Clearly, corridor protection must be undertaken at the earliest possible opportunity to avoid later complexities in planning and delivering infrastructure, primarily due to encroachment of incompatible development. This gives clarity to public and private investors regarding areas suitable for urban development or suitable for supporting transport connections, while also protecting land ready for when it may be required.

<sup>3</sup> Infrastructure Australia, *Corridor Protection: Planning and investing for the long term* (2017): 4 – <http://infrastructureaustralia.gov.au/policy-publications/publications/files/CorridorProtection.pdf>

<sup>4</sup> See <http://www.austlogistics.com.au/wp-content/uploads/2018/03/ALC-Submission-to-the-NSW-Draft-Freight-and-Ports-Plan.pdf>

As indicated in the Draft Western Sydney Freight Line Corridor Draft Strategic Environmental Assessment:

*Early corridor protection:*

- *provides greater certainty for land use planning*
- *minimises encroachment of incompatible urban development on the corridor*
- *encourages supportive land uses around proposed transport modes; and*
- *provides a 'value for money' approach through forward planning by reducing the costs of private property acquisition in future.*<sup>5</sup>

ALC's submission on the draft Freight and Ports Strategy also recommended that the NSW Government:

*"Prepare a Corridor Protection Strategy which notes:*

- (a) The future transport corridors which the NSW Government is seeking to protect from encroachment; and*
- (b) The planning process the NSW Government seeks to use to facilitate the protection of these corridors."*<sup>6</sup>

In the submission, ALC encouraged that the Corridor Protection Strategy be completed, with appropriate consultations, during 2019.

The development of the draft strategic environmental assessments, which is the first step in this process, is something for which the NSW Government is to be fully commended.

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<sup>5</sup> Transport for NSW *Draft Western Sydney Freight Line Corridor Draft Strategic Environmental Assessment* (2018):12

<sup>6</sup> ALC Draft Freight and Logistics Plan Submission Recommendation 4.

## What Needs to be Done

Infrastructure Australia has suggested the term ‘corridor protection’ covers a variety of government actions to identify land likely to be required for some form of future infrastructure and to then:

- *control or limit development on that land, especially parts of a corridor at risk of being ‘built out’;*
- *progressively acquire that land so that, by the time the infrastructure needs to be built, most or all of the corridor is in government ownership; and*
- *apply land use controls to adjoining land to protect the future operational integrity of the infrastructure.*<sup>7</sup>

However, it is important that once there has been identification of a preferred alignment for a major infrastructure corridor, statutory planning controls be implemented to protect it.

The level of protection provided to transport corridors and industrial lands is only as strong as the protections contained in the lowest level planning instrument.

At ALC Forum held in Sydney in March 2018, industry participants noted that small, incremental changes to local environment plans and development control plans can chip away at the protections offered industrial land uses, ultimately prejudicing the efficient use of the land.

ALC believes that any jurisdictional planning instrument or Commonwealth Government infrastructure funding agreement should contain the high level principles contained in **Attachment A – ALC Planning Principles**.

A State Environmental Planning Policy should also be made as soon as practicable to ensure that the relevant corridors identified in the four draft strategic environmental assessments are protected.

If necessary, changes should be made to the *Environmental Planning and Environment Act 1979* to remove any possible capacity for lower level planning instruments to be able to permit land uses prejudicing the efficient use of the transport corridors.

Once this is done, work can commence to build community support to produce an outcome that permits the cohesive co-existence of industry and residential areas.

ALC supports the four corridors that Transport for NSW is seeking to protect without amendment and commends the way it has ensured that the needs of the freight and logistics industry is recognised as Western Sydney continues to grow.

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<sup>7</sup> Infrastructure Australia *Corridor Protection: Planning and Investing for the Long Term* (2017):9

Please contact me on 0418 627 995 or at [Michael.Kilgariff@austlogistics.com.au](mailto:Michael.Kilgariff@austlogistics.com.au) should you wish to discuss this submission.

Yours sincerely

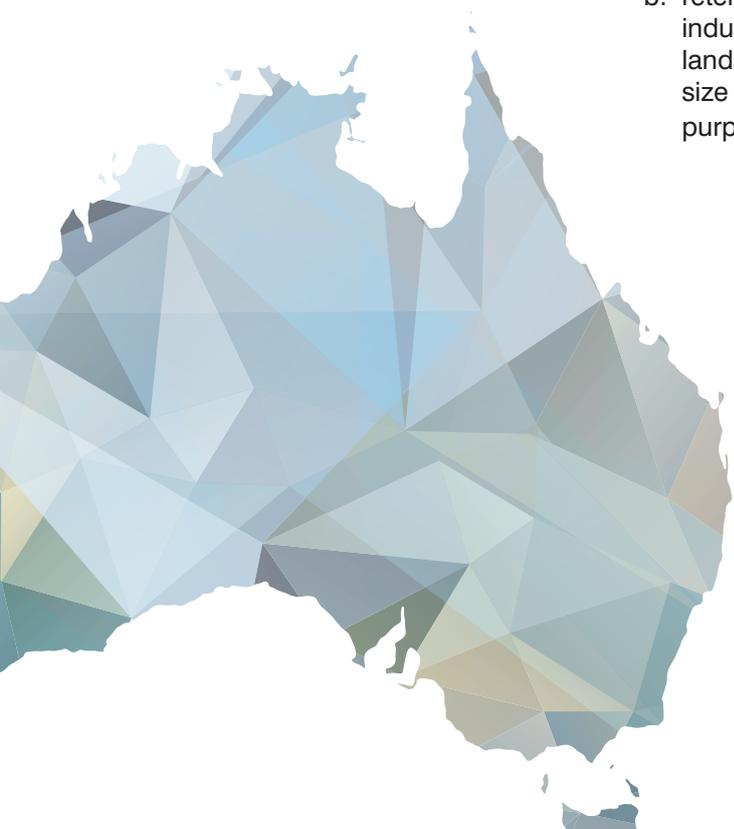
A handwritten signature in blue ink, appearing to read 'Michael Kilgariff', with a stylized, cursive script.

MICHAEL KILGARIFF  
Managing Director



# ALC NATIONAL PLANNING PRINCIPLES

- 1** All planning instruments must recognise that planning for transport and logistics (including ensuring the continued efficient operation of existing ports and other freight and logistics infrastructure) is an urban priority. This means that caps, curfews and other restrictions on how infrastructure (particularly ports and airports) are operated and used, must be avoided.
- 2** Compromised planning outcomes between industrial and residential uses fails both industry and residents. Planning instruments must incorporate sustainable land use planning solutions that allows industry to operate and expand in order to increase economic activity and jobs near where people live. Planning instruments should therefore contain land use compatibility features including:
  - a. land separation between residential and industrial lands; and
  - b. retention and protection of industrial and employment lands that are suitable in size for freight and logistics purposes.
- 3** Planning instruments must ensure that industrial lands and transport corridors are capable of operation 24 hours a day, seven days a week. State and territory governments must ensure planning instruments provide for mitigation measures when sensitive use developments (e.g. residential) are located close to freight infrastructure.
- 4** Planning instruments must identify a clear linkage of road and/ or rail infrastructure between employment lands and other clearly identifiable freight generation points, as well as other significant transport infrastructure such as ports, airports and intermodals.
- 5** Governments must establish effective corridor protection mechanisms to ensure timely preservation of surface, subterranean and air corridors and strategic sites for future infrastructure priorities.



Map of the Western Sydney Corridors

Transport for NSW is currently consulting on a number of transport corridors across Western Sydney. For more information visit [transport.nsw.gov.au/corridors](http://transport.nsw.gov.au/corridors)



**LEGEND**

- Existing Rail Network
- M12 Motorway
- Bells Line of Road - Castlereagh Connection
- Bells Line of Road - Castlereagh Connection (Kurrajong Heights tunnel section)
- Outer Sydney Orbital
- Western Sydney Freight Line
- Subject to Integrated Land Use
- South West Rail Link Extension
- North South Rail Line
- North South Rail Line Tunnel (Indicative and subject to detailed design)
- Potential future connections
- Western Sydney Airport (Indicative corridor through airport)
- Western Sydney Employment Area
- Growth Areas
- Parks & Green Space

Note: Stylised representation, corridor widths may not be to scale

